



Science Applications International Corporation An Employee-Owned Company

DCN: 607-SAI-GR-PRP-Search-03-02079

April 25, 2002

Ms. Carol Ropski United States Environmental Protection Agency 77 West Jackson, 5th Floor Chicago, Illinois 60604

RE:

Contract No. 68-W-00-091

SAIC Project Number: 06-5050-08-1202-017

Downers Grove Site, PRP Response Summary Table

Dear Ms. Ropski:

On February 27, 2002, SAIC received a Work Order from the United States Environmental Protection Agency (U.S. EPA) requesting assistance in reviewing and summarizing PRP responses to Request for information letters from the Illinois Environmental Protection Agency and the U.S. EPA relating to the Downers Grove Site (the Site).

On March 5, 2002, SAIC met with Carol Ropski, U.S. EPA Enforcement Specialist, to discuss the requirements of the Work Order. U.S. EPA requested that SAIC prepare a table summarizing each PRP's response(s) according to several primary areas of interest:

- Chlorinated solvent use and/or generation
- Environmental permits, spills and facility investigations
- Other parties which may have used or generated chlorinated solvents or experienced a spill of hazardous materials on property within the Site's boundaries
- Areas in which PRP was non-responsive
- Follow up recommendations

SAIC submitted a template PRP response table to U.S. EPA for approval on, March 15, 2002, and on March 26, 2002, U.S. EPA approved SAIC's template. SAIC began to review approximately 3 ½ boxes of PRP response documents and to summarize the contents according to U.S. EPA's instructions.

On April 16, 2002, SAIC was instructed to submit a draft of the PRP response summary table to U.S. EPA. Attached please find our preliminary submission, indicating our progress on the PRP response summary table to date. Please take note that this is a draft submission and that the final version may include response summaries for additional PRPs and/or supplemental information for PRPs already included in the table.



Downers Grove Site PRP Response Summary Table Page 2

Thank you for the opportunity to present this draft report to EPA. If you have any questions, please feel free to contact me.

Sincerely,

SCIENCE APPLICATIONS INTERNATIONAL CORPORATION

Lisa Mead, Task Order Manager

cc: Sandra Richardson

File

Enclosures

DCN: 607-SAI-PRP-SEARCH-03-02079

DOWNERS GROVE GROUNDWATER SITE PRP RESPONSE SUMMARY TABLE

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Ames Supply Company 2537 Curtiss Street Downers Grove, IL 60515 Respondent: John W. Loseman Lewis, Overbeck & Furman 135 S. LaSalle St., Suite 2300 Chicago, IL 60603-4274 phone: 312-580-1258	IEPA letter sent: 10/3/01 IEPA response date: Unknown. U.S. EPA CERCLA 104(e) sent: 3/29/02	IEPA Response: Ames Supply Company used chlorinated solvents, including Perchloroethylene (PCE) and Trichloroethylene (TCE), during their operational procedures. Chlorinated solvents were observed in the expansion joints of the concrete floor during the November 2000 Phase I Environmental Site Assessment (ESA).	IEPA Response: Permits: None Spills: None Facility Investigations: 1) In November 2000, a Phase I ESA was conducted at the site property. 2) In July 2001, a Phase II Subsurface Soil Investigation was performed at the site property, which concluded that no elevated contaminated readings were detected according to IEPA TACO 732 industrial/commercial standards. A supplemental Subsurface Soil Investigation was performed in September 2001. The investigation tested for chlorinated solvents, but none were found.	IEPA Response: Arrow Gear Co., located at 2301 Curtiss Street, is registered on the Leaking Underground Storage Tank (LUST) list. Suburban Moving & Storage, located at 2400 Wisconsin Ave., is also registered on the LUST list. Rexnord Bearing Division of Rexnord Corp, located at 400 Curtiss St., and Bison Gear & Engineering Co., located at 2424 Wisconsin Ave., are both on the Large Quantity Generator List.	IEPA Response: None	Because the 2001 Phase II Assessments revealed no contamination by chlorinated solvents, no follow-up questions are recommended for this facility.

Response Summary: The property is owned by White Lake Building Corporation, which leased the property to Ames Supply Company from June 1, 1962, through at least August 31, 2001. The property consists of a one-story (with a partial second floor) brick building. Ames has been the sole tenant of the building since its construction in 1962. Ames is a wholesaler and small manufacturer of rubber rolls and a wholesale distributor of office machine parts and prepackaged cleaning supplies.

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Arrow Gear Company 2301 Curtiss St. Downers Grove, IL 60515 Respondent: Angela Elbert Dietz Neal, Gerber & Eisenberg Two North LaSalle St. Chicago, IL 60602-3801 phone: 312-269-8074	IEPA letter sent: 10/3/01 IEPA response date: 11/1/01, 12/4/01 No U.S. EPA CERCLA 104(e) sent.	IEPA Response: According to an Illinois industrial pretreatment questionaire, Arrow Gear Company stored chlorinated solvents in drums. Approximately 220 gallons were stored onsite at one time. The solvents were recycled after used. In 2000, a toxic chemical processing and usage evaluation determined that the subject constituents do not meet Superfund Amendment and Reauthorization Act (SARA)'s threshold reporting requirements. In 1992, Arrow Gear Company disposed of 65 gallons of TCE. The supplier collected the waste.	IEPA Response: Permits: 1) IEPA, National Pollutant Discharge Elimination System Permit for Industrial Storm Water, effective 6/01/98, expires 5/31/03; 2) IEPA, Operating Permit for Smaller Source, issued 4/22/97; 3) Office of Illinois State Fire Marshall, Permit for Installation of Underground Storage Tanks (USTs) and Piping for Petroleum and Hazardous Materials, approved 1/17/91; and 4) Office of Illinois State Fire Marshal, Permit for Abandonment in Place of USTs and Piping for Petroleum and Hazardous Substances, approved 6/27/91, expired 12/27/91. Spills: In 1988 or 1989, one 55-gallon drum of TCE was delivered with a pin size hole, through which several ounces of TCE leaked indoors, on the shipping/receiving dock. Facility Investigations: According to a 1996 Phase I ESA, a private well used by a small subdivision to the east of the property was closed due to elevated levels of TCE. Stains were observed on the floor of the facility's loading dock bay and the surrounding floor drain. No catch basins were seen to be servicing the loading dock, and it appeared as though the water in the loading dock was diverted directly as runoff to St. Joseph's Creek through drainage pipes.	IEPA Response: None noted.	IEPA Response: None.	Request a copy of the documents obtained by Northwest Envirocon, Inc., pursuant to the Freedom of Information Act request regarding the well adjacent to the property that was closed due to elevated levels of TCE.

ENFORCEMENT CONFIDENTIAL PAGE 2 OF 29

Arrow Gear Company Continued:

Response Summary: The Arrow Gear Company property consists of two one-story brick buildings. Arrow Gear Company has owned and operated on the property from 1957 to the present. The property was owned by Raymond T. Lopata prior to Arrow Gear Company, and was vacant. Arrow Gear Company manufactures high-precision gears and gear blanks. Four aboveground storage tanks (ASTs) for waste, mineral spirits, coolant oil, and sludge, which have been in use since early 1992, are located in the shipping and dock area. One 1,800-gallon UST that contained waste oil and coolant was in use from 1967 until 1991, at which time it was abandoned by permit. A 1,000-gallon UST used to store quenching oil was abandoned by permit in 1991 and was removed in 1993. The tank was visibly deteriorated and stained soils were detected. Soil samples were not tested for PCE or TCE. On March 11, 1993, 45 cubic yards of soil contaminated with petroleum product were removed from the property.

ENFORCEMENT CONFIDENTIAL PAGE 3 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Bales Mold Service, Inc. 2824 Hitchcock Avenue Downers Grove, IL 60515 Respondent: Bales Mold Service, Inc. Steven J. Bales, President 2824 Hitchcock Avenue Downers Grove, IL 60515 (630) 852-4665 fax: (630) 852-4687	IEPA letter sent: 10/3/01 IEPA response date: 10/24/01 No U.S. EPA CERCLA 104(e) sent.	IEPA Response: Bales Mold Service, Inc., purchased a small vapor degreaser in February 2000 that holds approximately five gallons of TCE. PRP has not yet disposed of any of the solvent, as most of it evaporates.	IEPA Response: Permits: 1) Downers Grove Sanitary District, Industrial Wastewater Discharge Permit, issued 11/20/97, expires 11/20/2002; 2) IEPA, Lifetime Operating Permit, Injection Mold Servicing, issued 9/8/98; 3) IEPA, Construction Permit, Chrome Plating and Caustic Stripping, issued 10/6/94; 4) IEPA, Construction Permit for Hard Chrome Electroplating Operation, Injection Mold Servicing Facility, issued 11/5/98. Spills: None. Facility Investigations: 1) On August 19, 1999, total chrome moisture and flow rate testing on a plating tank revealed total chromium of 0.007 mg/DSCM. 2) Between 1997 and 2001, soil samples were collected and analyzed for metals, revealing elevated levels of nickel, chromium, zinc, lead, and copper in some samples.	IEPA Response: In March 1994, a Phase I ESA was performed for 5100-08 Thatcher Rd., adjacent to the Bales property. The property occupants were: 5100 - Cablevision, 5104 - Cannon Turf Supply, and 5108 Thatcher - Global Gear. No chlorinated solvents were noted in the assessment report.	IEPA Response: None.	Request exhibits B-G. These exhibits, which are attachments to the IEPA letter response and indicate the locations of utilites, surface structures, ground water wells, and drainage systems, are missing from the documents. What process was used for degreasing prior to February 2000?

Response Summary: Bales Mold Service, Inc., provides mold coatings to plastic industries. Bales Mold Service, Inc., which purchased the property in March 1984 from Larry Penn, is owned by Steven J. Bales. As of the response date, the company had not yet completely filled a disposal drum of TCE, and therefore had not needed to dispose of any.

ENFORCEMENT CONFIDENTIAL PAGE 4 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
The Burlington Northern and Santa Fe (BNSF) Railway Company Respondent: Pamela Nehring Senior General Attorney 104 W. Chestnut, PMB #313 Hinsdale, IL 60521 (817) 352-3469 Fax: (817) 352-3468 Pamela.Nehring@BNSF.c om Additional Address: 2500 Lou Menk Drive Fort Worth, TX 76131- 2828	U.S. EPA CERCLA 104(e) sent: 2/15/02 Date received by PRP: 2/20/02 Response Date: 03/13/02	U.S. EPA Response: No request was issued specific to chlorinated solvents	U.S. EPA Response: Permits: No request was issued specific to permits. Spills: BNSF Railway provided no information regarding the March 4, 1973, train derailment or any release of hazardous substance resulting therefrom. Facility Investigations: No request was issued specific to facility investigations.	U.S. EPA Response: None noted.	U.S. EPA Response: PRP did not provide any documentation requested by U.S. EPA. According to BNSF Railway, it has no information or documentation relative to the 1973 train derailment that is responsive to EPA's request for information. BNSF Railway objected to and did not respond to EPA's request regarding a maintenance yard in Downers Grove.	BNSF Railway's letter was non-responsive and appears suspicious. It seems unlikely that no information or documentation of a train derailment was retained by the company relating to cargo, release of materials, or disposal of the railway cars.

Response Summary: Burlington Northern and Santa Fe Railway Co. has no information regarding the 1973 train derailment or that any railcars were buried as a result of it. BNSF Railway objects to EPA's request for information regarding a maintenance yard in Downers Grove because it does not specify the Downers Grove area that the yard was in. BNSF Railway requests further information in order to search its records.

ENFORCEMENT CONFIDENTIAL PAGE 5 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
C & C Machine Tool Service, Inc. Kathleen Chapas 5024 Chase Avenue Downers Grove, IL 60515 phone: 630-810-0484 Respondent: Enviromark, Inc. Keith Tice, President 2S 173 Huntington Place Glen Ellyn, IL 60137 phone: 630-858-5559	IEPA letter sent: 10/3/01 IEPA response date: 10/24/01 No U.S. EPA CERCLA 104(e) sent.	IEPA Response: C & C Machine Tool Service, Inc., states that it has not purchased or used chlorinated solvent/cleaner or other chlorinated materials during its tenure at the facility. Between 1998 and 2001, this PRP received 15 Land Disposal Restriction Notifications from Safety-Kleen for liquid aqueous parts cleaner waste they collected containing 6 mg/kg PCE. This PRP uses Safety-Kleen Heavy Duty Lacquer Thinner 6782 which contains 0-1% PCE.	IEPA Response: Permits: None. Spills: None. Facility Investigations: None noted.	IEPA Response: None noted.	IEPA Response: None.	Request information regarding previous lessees from Ned Lopata, Chase-Belmont Properties, 5103 Chase Ave., Downers Grove, IL 60515.

Response Summary: The facility at 5024 Chase Ave. was built in 1972 as part of an office complex. C & C Machine Tool Service, Inc., has leased it from Chase-Belmont Properties since September 1, 1996, and has no knowledge of prior lessees business activities. C & C Machine Tool Service, Inc., performs electrical rebuilding and reconditioning of housings and equipment for printing presses. They use Sherwin Williams and Ketone paints and solvents to clean and paint the parts and equipment. The used paint, filters, and solvents are stored in containers provided by Safety Kleen until they are collected by Safety Kleen for disposal. There are no USTs or ASTs on their property. Wastewater and storm water are disposed of through the Downers Grove sewer system. Waste hauling was conducted by Browning-Ferris Industries from 1996 through mid 2000, and by Onyx Waste Services, Inc., from mid-2000 through August 2001. C & C Machine Tool Service, Inc., has a paint spray booth. The average inventory of hazardous materials is twelve 12-oz. cans of primer, one gallon of enamel, one gallon of thinner, one gallon of spray gun cleaner. There are no solid waste units at the facility.

ENFORCEMENT CONFIDENTIAL PAGE 6 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Contemporary Control Systems, Inc. (CCSI) 2431 Curtiss Street Downers Grove, IL 60515 Respondent: George M. Thomas, President Contemporary Control Systems, Inc. (630) 963-7070 fax: (630) 963-0109 e-mail: info@ccontrols.com www.ccontrols.com	No IEPA letter. U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/02 Response date:	U.S. EPA Response: CCSI has never used any solvents containing TCE or PCE in any manufacturing process.	U.S. EPA Response: Permits: None. Spills: None. Facility Investigations: None.	U.S. EPA Response: None noted.	U.S. EPA Response: None.	Determine other operators at the facility and send CERCLA 104(e) requests.

Response Summary: CCSI was incorporated in 1992 and assembles printed circuit boards and mounts them into enclosures using "state-of-the-art, environmentally responsible manufacturing methods." The only hazardous substance used by CCSI is the lead contained in a tin/lead solder. All hazardous waste is removed from the CCSI facility by Alpha Fry Metals according to U.S. EPA approved methods for handling and storing hazardous waste. CCSI leased a facility at 2515 Wisconsin Ave. from Park Investors Venture I from December 1992 until November 1998, when it moved to its current location, which is leased from Spruce Building, LLC. CCSI occupies a portion of the multi-unit building. Other businesses also occupy the building. The prior operator of the 2512 Wisconsin Ave. facility was Hollister, Inc., and of the 2431 Curtiss St. facility was Lovejoy, Inc., who used the premises as a machine shop facility.

ENFORCEMENT CONFIDENTIAL PAGE 7 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
CVP Systems, Inc. 2518 Wisconsin Avenue Downers Grove, IL 60515 Respondent: Richard D. Kelly Vice President and General Manager CVP Systems, Inc.	No IEPA letter. U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/02 Response date: 2/25/02	U.S. EPA Response: CVP Systems, Inc., states that between 1950 and the present, it never used, purchased, stored, etc., any hazardous substances or materials at any location in the Ellsworth Industrial Park.	U.S. EPA Response: Permits: None. Spills: None. Facility Investigations: None.	<u>U.S. EPA Response</u> : None noted.	<u>U.S. EPA Response</u> : None.	Request information regarding operation of the parts washer. Request information regarding previous owners/lessees from Park Investors Venture I, LLC, c/o Darwin Asset Management Co., 970 N. Oaklawn Ave., Ste. 100, Elmhurst, IL 60126.

Response Summary: CVP Systems, Inc., has leased the facilities at 2514-2518 Wisconsin Ave. from Park Investors Venture I, LLC since 8/1/84. Two mini dumpsters provided by Browning-Ferris Industries are used for non-hazardous trash. They are emptied by Browning-Ferris Industries twice per week. From May 1991 to February 1998, Safety-Kleen provided a tank for disposal of lubricant used for metal working machines and a parts washer.

ENFORCEMENT CONFIDENTIAL PAGE 8 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Dynagear, Inc. 2500 Curtiss Street Downers Grove, IL 60515 Respondent: Penny Green, V.P. of Human Resources Dynagear, Inc. 2500 Curtiss Street P.O. Box 1406 Downers Grove, IL 60515 (630) 969-1008 Fax: (630) 969-9307	IEPA letter sent: 10/3/01 Response date: 10/31/01 No U.S. EPA CERCLA 104(e) sent.	IEPA Response: Dynagear, Inc., has purchased no chlorinated solvent/cleaner.	IEPA Response: Permits: None. Spills: None. Facility Investigations: In June 1998, a Phase I ESA was conducted at the facility. The facility was found to be in good environmental condition. No ASTs or USTs were found. No hazardous waste generation or storage was observed. A title search on the subject property was conducted for the ESA, and there was no indication that the property was ever used for storage or disposal of hazardous materials.	IEPA Response: None noted. (See Morey Corporation response)	IEPA Response: None.	It is unclear whether the Phase I assessment is the same as the IEPA investigation mentioned in the Morey response. Request a copy of the IEPA Site Inspection Report.

Response Summary: Dynagear, Inc., constructed the building in 1987 and has occupied it since. At the time of the Phase I ESA, the property was owned by NBD Trust Company. The facility consists of a one story warehouse and manufacturing building. All chemicals are bought by Dynagear from Perkins Products and Zep Products, and all waste is disposed of by Beaver Oil. No solid waste has been removed from the facility in the last five years.

ENFORCEMENT CONFIDENTIAL PAGE 9 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Grove Automotive	IEPA letter sent:	IEPA Response: Operation uses	IEPA Response:	IEPA Response: None noted.	IEPA Response: Grove Automotive, Ltd., did not	Request Material Safety Data Sheets (MSDSs) for cleaning
5103 Belmont Rd. Downers Grove, IL 60515	10/03/01 Response date:	unspecified parts cleaning fluids, which are stored in drums and	Permits: According to the response, no local, state or federal hazardous waste	noted.	provide documentation of	solvents. Grove Automotive, Ltd.,
Respondent:	10/28/01	removed by Safety Kleen. Grove Automotive, Ltd., did not state the	permits were granted for the facility. Spills: no hazardous substances were	·	purchase or disposal of chlorinated solvents from	stated that they use Safety Kleen, but did not indicate how long. The
Grove Automotive, Ltd.	U.S. EPA	period of time they have used	disposed of on or adjacent to the property.		1972 to the present.	garage has been in business for 20
Tom Twardy, Owner 5103 Belmont Rd.	<u>CERCLA 104(e)</u> <u>sent</u> : 1/30/02	Safety Kleen.	Facility Investigations: there are no reports relating to soil, water or air quality			years, likely using chlorinated solvents the whole time. What did
Downers Grove, IL 60515	Date received by		at the facility All tenants of the facility			they do before Safety Kleen?
Glen Blum, Property	<u>PRP</u> : 2/4/02		were checked for compliance.			, i
Owner						
6224 Western Ave.						
Willowbrook, IL 60527				ļ		
Christine Blum, Property						
Owner 4529 Belmont Rd. Downers Grove, IL 60515	·					

Response Summary: Property owners are Glen Blum and Christine Blum. Property has been family owned for 41 years. Operator since 1982 is Grove Automotive, Ltd., an auto repair service garage owned by Tom Twardy. Previous operators were Carl Blum Carbonic Gas Co. (1960-1966) and Burk's Carbonic Co. (1966-1982). Solid waste is removed by BFI Co. Used antifreeze is collected by Recycle Technologies, Inc. Drain oil is stored in a 200 gallon tank located outside the northwest corner of the building and is pumped out as needed by R.S. Used Oil Services

ENFORCEMENT CONFIDENTIAL PAGE 10 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Hahn Graphics, Inc. 5023 Chase Ave. Downers Grove, IL 60515 Respondent: Hahn Graphics, Inc. William W. Hahn 5023 Chase Ave. Downers Grove, IL 60515	IEPA letter sent: 10/03/01 IEPA response date: 10/11/01 No U.S. EPA CERCLA 104(e) sent	IEPA Response: Unspecified cleaning agents are picked up and recycled by Safety Kleen.	IEPA Response: Permits: None noted. Spills: Hahn Graphics, Inc., has no knowledge of any spills at the facility. Facility Investigations: Approximately 5 years ago, a "team" interviewed the Hahn Graphics, Inc., regarding ink and fountain chemicals and disposal practices, and was satisfied with Hahn Graphic, Inc.'s, handling practices.	IEPA Response: None noted.	IEPA Response: Property description did not include all requested information. Hahn Graphics, Inc., did not indicate who the "team" of inspectors were. Hahn Graphics, Inc., provided a limited response.	Request MSDSs for cleaning agents. Request copy of inspection report from 5 years ago.

Response Summary: Hahn Graphics, Inc., is a small (less than \$1,000,000 annual sales) offset printing company, owned by Bill Hahn and Chris Wagner, that has leased the facility since 1987. It has been in business for 33 years. The company employs 6 people. Onsite are two AB Dick duplicators and one Sakurai printing press. The facility does not have any waste pits or ponds. All material is purchased in gallon increments. The owner of the property is Chase-Belmont Properties. Previous operator was a computer company.

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Econotemp, Inc. 5280 Belmont Road Downers Grove, IL 60515 Respondent: Steven E. Graves, President Econotemp, Inc. 5280 Belmont Road Downers Grove, IL 60515	IEPA letter sent: 10/3/01 IEPA response date: 10/25/01 U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/02	IEPA Response: None. Econotemp's response to all questions relating to hazardous materials is, "Not applicable."	IEPA Response: Permits: None required. Spills: None. Facility Investigations: None.	IEPA Response: Econotemp, Inc., purchased the property from Molex, Inc. See Molex response summary.	IEPA Response: Econotemp, Inc., provided no information regarding its operation's practices and history	Request documents pertaining to the purchase of the property from Molex, Inc., and possibly perform a title search. Request information regarding Econotemp's business practices.

Response Summary: Econotemp purchased the property in January 1987 from Molex, Inc. No further information is available.

ENFORCEMENT CONFIDENTIAL PAGE 11 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Atlas Tube 2300 Wisconsin Avenue Downers Grove, IL 60515 Respondents: Gordon E. VerWeyst Vice President J.L. Clark 923 23rd Avenue Rockford, IL 61104 (815) 961-5674 (815) 962-8861 Fax: (815) 962-6356 www.jlclark.com Arthur A Vogel, Jr. Quarles & Bradley, LLP 411 East Wisconsin Avenue Milwaukee, WI 53202- 4497 (414) 277-5545 Fax: (414) 271-3552 Brian K. Lewallen Quarles & Bradley, LLP 411 East Wisconsin Avenue Milwaukee, WI 53202-	U.S. EPA CERCLA 104(e) sent: 01/30/02 Date received by PRP: 2/2/02 Response Date: 03/15/02	US EPA Response: As indicated in the MSDSs attached to the response, AtlasTube used products containing Trichloroethane (TCA) (between 10% and 30%), PCE in carpet shampoo (1%) and an unspecified chlorinated solvent (33.5%) in its machine shop. It also used a product called Taskmaster Stainless, containing 1,1,1TCE	US EPA Response: Permits: Permit to operate emission sources or air pollution control equipment; issued on at least 12/18/84. On 10/28/85, Downers Grove Sanitary District approved Atlas Tube's Solvent Management Plan. Spills: There are no known leaks, spills, or releases of hazardous substances or pollutants at the facility. Facility Investigations: IEPA conducted a site investigation on 3/6/81, which revealed that Atlas Tube was not in compliance with the requirement that a copy of its contingency or emergency plan be filed with local police and fire departments, hospitals, and emergency response teams.	U.S. EPA Response: None noted.	U.S. EPA Response: None.	None. Apparently Atlas Tube used few chlorinated solvents in its manufacturing processes. There is no evidence of any hazardous material release at the facility.
4497 (414) 277-5553 Fax: (414) 271-3552	·					

ENFORCEMENT CONFIDENTIAL PAGE 12 OF 29

J.L. Clark Continued:

Response Summary: J.L. Clark purchased Atlas Tube and its facility from Da-Kay Enterprises, Inc., on January 6, 1967. Atlas Tube, a division of J.L. Clark, operated at 2300 Wisconsin Ave., Downers Grove, IL from 1967 to 1997, when its assets, but not the property, were sold to CCL Tube Corporation. CCL TubeCorporation vacated the facility in 1998. The property was owned by J.L. Clark until 1998, when it was sold to MXL Industries, Inc. Atlas Tube manufactured collapsible aluminum tubes for various consumer products (hair dyes, ointments, toothpaste, etc.). Prior to the late 1980s or early 1990s, the tubes were also manufactured from lead. Solvents were stored in a specifically designed locker. The locker floor is 7 inches below the Plant floor level. Spill container capacity for the locker is 1,990 gallons. Solvents were stored in 5- to 55-gallon containers and taken to production areas by hand in 5-gallon containers. In the late 1980s and early 1990s, solid waste was hauled off-site five days per week by ROT's Disposal. About 100 cubic yards of solid waste were generated per month. Between at least 1992 and 1995, hazardous wastes were picked up by Avganic Waste Solvent (Hydrite), 114 N. Main St., Cottage Grove, WI for recycling or introduction into a fuel program. In 1996, waste oil was removed by Motor Oils Refining Company, 7601 W 47th St., McCook, IL and hazardous wastes were taken to American Chemical Service, 420 Colfax, Griffith, IN for refining. During the 1980s and 1990s, waste contractors were Mahzel Metals (scrap metal/lead dross), Safety Kleen Corp., Breslube, Peoria Disposal Company (lead brick), LWD, Inc., Waste Research & Reclamation, and Winnebago Reclamation (asbestos). There were no waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, or tanks located onsite. Hazardous wastes were generally stored in a paint locker until shipped offsite.

ENFORCEMENT CONFIDENTIAL PAGE 13 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Joe Madden Ford 5126 Walnut Avenue Downers Grove, IL 60515 Respondent: Michael R. Goldstein Gunster Yoakley, Attorneys at Law One Biscayen Tower 2 S. Biscayne Blvd., #3400 Miami, FL 33131-1897 (305) 376-6000 Fax: (305) 376-6010 Email: mgoldstein@gunster.com Website: www.gunster.com Additional Contact: James Wackerlin, Service Director 5126 Walnut Avenue Downers Grove, IL 60515	IEPA letter sent: 10/03/01 IEPA Response dated: 11/01/01; supplemental response 11/21/01.	IEPA Response: The only chlorinated solvent that is currently or was formerly used at the facility is recycled paint thinner for the paint gun cleaner. It is contained in four- or fivegallon containers and contains only trace amounts of chlorinated materials. Approximately eight gallons of recycled paint thinner waste are generated per month.	IEPA Response: Permits: None. Spills: None. Facility Investigations: Based on a Phase I ESA performed in October 1999 (not attached to response), there was evidence of spills (oil and laquer) around the storage drums inside and outside the body shop and used batteries and tires discarded on site. The spills and debris have been removed. No leaks, spills or releases have occurred after October 20, 1999. A Phase II ESA was performed prior to 11/19/99, which revealed no contamination in areas that were tested above applicable corrective action or cleanup levels for potable groundwater.	IEPA Response: None noted.	IEPA Response: None.	None of the attachments listed in the response were attached. Request copies of the Phase I (11/22/99) and Phase II (12/6/00) EA reports; ComplyNet Corp.'s Results of Field Investigation in Response to Illinois Environmental Protection Agency Request for Information (11/3/01); and the Asset Purchase Agreement. Also request waste manifests for recycled paint thinner.

Response Summary: The facility was vacant until 1988, when an auto repair and maintenance shop was constructed. Joe Madden Ford owned the auto repair shop from 1988 until 1999, leasing the property from the Madden Partnership. On 11/19/99, AutoNation, Inc., and AN/MF Acquisition Corp., entered into an Asset Purchase Agreement with Joe Madden Ford, 2150 West Ogden Avenue Limited Partnership, Madden Partnership, and the Principals to purchase the assets of the Joe Madden Ford dealership business. The Madden Partnership owns the property and AutoNation leases the facility. The Joe Madden Ford Automotive Body Shop is an auto service and repair shop. Two paint spray booths and a paint mixing room are located on site. Spent solvents, used antifreeze, oils and waste paints are containerized and recycled or disposed of by outside vendors. There is also a parts washer on site, which uses mineral spirits and is serviced by Safety Kleen. Scrap metal is contained in a rolloff box and picked up by a recycler. There are no waste piles, landfills, surface impoundments, waste lagoons, pits, or aboveground or underground storage tanks at the facility. Sanitary and wastewater is routed through 2 triple catch basins or oil-water separators prior to discharge into the city sewer system. Used paint booth filters are disposed of through Browning-Ferris Industries on an as-needed basis.

ENFORCEMENT CONFIDENTIAL PAGE 14 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Liberty Copper & Wire c/o Litton Systems, Inc. 2333 Wisconsin Ave. Downers Grove, IL 60515 Respondent: Jill M. Palmer Northrop Grumman Corp. Washington Office 1000 Wilson Blvd., Ste. 2300 Arlington, VA 22209-2278 (703) 875-8422	IEPA letter sent: 10/3/02 IEPA response date: 11/29/01 U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/02 Response date: 2/25/02	U.S. EPA Response: Litton Systems, Inc., no longer has this information.	U.S. EPA Response: Litton Systems, Inc., no longer has this information.	*See Suburban Self Storage's response.	U.S. EPA Response: Litton Systems, Inc., was non-responsive. However, the operations were sold nearly 20 years ago, so it is unlikely that they have any infomation.	Send a CERCLA 104(e) Request to Magne Tek, Inc. The last known address for Magne Tek, provided by Northrop Grumman Corp., is 26 Century Blvd., P.O. Box 290159, Nashville, TN 37229-0159.
Liberty Copper & Wire c/o Litton Systems, Inc. 1725 Jefferson Davis Hwy., Ste. 601 Crystal Square Two Arlington, VA 22202- 3285						

Response Summary: Liberty Copper & Wire was incorporated in DE on 4/5/56, acquired by Jefferson Electric Co. on 6/12/70, and merged into Litton Systems, Inc., on 8/31/72. Liberty Copper & Wire was sold, along with the Downers Grove facility, to MagneTek, Inc., of The Spectrum Group, Inc., on 7/1/84. All documents related to Litton System's operation of Liberty Copper & Wire were transferred to MagneTek pursuant to the sale of the facility. Liberty Copper & Wire's address was 2333 Wisconsin Ave. in Downers Grove, and its business was "magnetic wire, bunched and stranded copper wire, bare and tined aluminum wire."

ENFORCEMENT CONFIDENTIAL PAGE 15 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Magnetrol International, Inc. 5300 Belmont Road Downers Grove, IL 60515 Respondent: Magnetrol International, Inc. Richard Lamz Executive Vice President 5300 Belmont Road Downers Grove, IL 60515 (630) 969-4000 Fax: (630) 969-9489 www.magnetrol.com	IEPA letter sent: 10/3/01 IEPA Response dated: 10/30/01	IEPA Response: Magnetrol International, Inc., has not purchased or used chlorinated solvents since prior to 1995. A 1,1,1 TCE degreaser with a 500 gallon tank had been used at the site. According to the waste manifests attached to the response, Magnetrol International, Inc., used TCE and PCE from at least 1980 (the earliest manifest provided) until 1995. No manifests after 1997 were provided. TCE is not evident on the manifests after 1990. Hazardous materials are no longer used at the facility in quantities that are subject to reporting under SARA Section 313.	IEPA Response: Permits: None noted. Spills: Magnetrol International, Inc., has no evidence of a leak, spill, release or threatened release of hazardous substances at the facility. Facility Investigations: In October 1998, a Phase I ESA was performed for the facility. It was determined that no significant environmental concerns were evident, however, the hazardous material storage room had oil-saturated absorbent material and liquid on the floor. No staining or concrete deterioration was observed on the floor in the location of the former TCE degreaser. Magnetrol generates less than 1,000 kg. of waste per month.	IEPA Response: Tricon Industries is an adjacent facility that uses a large quantity of chlorinated solvents in its processes. It released 10,992 lbs. of TCE between 1987 and 1982. The following companies have recorded LUSTs near the subject facility: Amoco Oil, Arrow Gear Co., Slampak Enterprises, and Suburban Moving & Storage. Downers Grove Public Wells #6 and #8 and Suburban Self Storage are two CERCLIS sites within 1 mile of the facility.	IEPA Response: None.	Request copies of waste manifests after 1997. How long was the TCE degreaser used at the facility?

Magnetrol Continued:

Response Summary: The Magnetrol International, Inc., facility was built in 1960. In 1961, Schaub Engineering, which was founded by Fred Schaub, purchased the facility. Robert Schaub, Fred's son, took over the business in the early 1970s. On 2/21/78, the business and the property were sold, and the company's name was changed to Magnetrol International, Inc. Since 1978, the facility has been owned and operated by Magnetrol International, Inc., which manufactures level and flow controls. It purchases paints, solvents, and other chemicals to use in its manufacturing processes. Magnetrol International Inc.'s owner, President, and CEO is Judy Stevenson. Two 8,000 gallon heating oil USTs were removed from the facility in 1987 to construct a garage and atrium. Hazardous materials generated by Magnetrol are picked up by a licenced waste hauler for incineration or are returned to the manufacturer for recycling. Magnetrol International, Inc., is listed as a large quantity generator, but does not operate under this level of hazardous waste generation. All materials are stored within the building. Hazardous materials are labeled with Haz-mat codes and, if flammable, stored in metal cabinets.

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Maple Plaza Cleaners 2265 Maple Avenue Downers Grove, IL 60515 Respondent: Maple Plaza Cleaners Yoon Hyun Kwak, Owner Sung Kang, Manager 2265 Maple Avenue Downers Grove, IL 60515 (630) 852-7670 Pager: (630) 695-8720 Management Company: Inland Management, Inc. 2401 Butterfield Road Oak Brook, IL 60523 (630) 954-5656	IEPA Response dated: 10/25/01	IEPA Response: Maple Plaza Cleaners uses less than 140 gallons of PCE yearly in its dry- cleaning processes. It uses one dry-to-dry machine, which was installed in 1989. A refrigerated condenser is used to meet control requirements for the machine.	IEPA Response: Permits: None noted. Spills: None noted. Facility Investigations: On 7/17/98, drilling was performed inside and outside the facility. No evidence of contamination was found. On 8/1/01, Maple Plaza Cleaners received confirmation that it had passed an inspection by the Dry Cleaners Environmental Response Trust Fund of Illinois. On 6/12/02, Maple Plaza Cleraners was found to be in compliance with all relevant State of Illinois and federal environmental regulations and the requirements of the Drycleaners Environmental Response Trust Fund of Illinois.	IEPA Response: None noted.	IEPA Response: None.	Respondent provided illegible copies of its waste manifests. Request better copies.

Response Summary: Maple Plaza Cleaners is a conditionally exempt, small-quantity generator, dry cleaning operation, located in a one-story shopping center since September 23, 1992. The property is owned and managed by Inland Commercial Property Management, Inc. Maple Plaza Cleaners is owned by Yoon Hyun Kwak. There are no ground water wells and the storm water drains are connected to the city sewer system.

ENFORCEMENT CONFIDENTIAL PAGE 17 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Molex, Inc. 5224 Katrine Ave. and 5225 Walnut Ave. Downers Grove, IL 60505 Respondent: Gene Hermanny Security/Safety Manager Molex, Inc. 2222 Wellington Ct. Lisle, IL 60532	No IEPA letter. U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/02 Response date: 2/18/02	U.S. EPA Response: "At no time did Molex ever use trichloroethylene or tetrachloroethylene in any of our operations at either Walnut or Katrine."	U.S. EPA Response: Permits: None. Spills: During the removal of a UST that contained mineral spirits in 1999, ground contamination was found around the tank. The contamination occurred from spillage during the filling process. The contaminated soil was removed and the site remediated under the supervision of the State Fire Marshall's office. Facility Investigations: Monitoring wells at the site that checked for any chemicals that might have leached into the soils were tested after the plating operations ended and were found to be clean.	<u>U.S. EPA Response</u> : None noted	U.S. EPA Response: None.	Request copies of report of monitoring well testing after operations ceased. Perform a title search for the property at 5225 Walnut Ave. and 5224 Kathrine Ave. to determine current owner(s) or operator(s).

Response Summary: Molex's facility on Walnut Ave. ceased doing plating operations in 1993 when the operation was moved to Arkansas. Any documents associated with the operation at 5225 Walnut were destroyed years ago. The waste stream from the plating operation consisted of nickel sludge. The only other chemical used was mineral spirits in a stamping operation at the Walnut facility. Molex purchased the Katrine property from a trust of the Sears Bank and Trust Company on 1/24/64. Respondent does not have the paperwork associated with the purchase of the Walnut site.

ENFORCEMENT CONFIDENTIAL PAGE 18 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
The Morey Corporation 2569 Wisconsin St. Downers Grove, IL 60515 Respondent: The Morey Corporation Dana Morey, Vice President 100 Morey Drive Woodridge, IL 60517 (630) 754-2300 Fax: (630) 754-2001 www.moreycorp.com Additional Contact: Gary Rovner Foley & Lardner (312) 558-6606	IEPA letter sent: 10/3/01 IEPA Response dated: 11/16/01	IEPA Response: Hazardous waste manifests indicate no disposal or recycling of PCE or TCE during The Morey Corporation's operations at the facility. An MSDS for Locquic® Primer dated 1985 indicates 98% TCA as its chemical composition. An MSDS dated 1992 for McLube 2003 indicates 95-99% 1,1,2-Trichloro-1,2,2-trifluoroethane. Between 1992 and 2001, The Morey Corporation stored and used approximately 390 cans of Slide Epoxease Aerosol, which contains 55-65% TCE. "Predicting Groundwater Concentrations Using Equation R14" form indicates that groundwater concentrations of TCE and PCE at the storage room drain area were predicted from maximum detected soil concentrations to be 56.075 mg/L and 3.879 mg/L, respectively.	IEPA Response: Permits: None noted. Spills: Prior to May 18, 2000, a release of a flux thinner containing isopropanol and methanol occurred from a floor drain in the storage room, resulting in the removal of approx. 1.5 cubic yards of soil. Facility Investigations: On May 9, 2000, a Phase I ESA was performed, which revealed soil contaminated with PCE, TCE and vinyl chloride. A Phase II Site Assessment was completed in June 2000 to determine the extent of the impact plume of contaminants discovered at the site. The highest detections were located near the loading dock. PCE was detected as high as 220.8 ppm and TCE as high as 5.96 ppm. Between August 2000 and January 2001, a focused site investigation was performed at the site. The investigation revealed elevated levels of PCE, TCE, vinyl chloride, methylene chloride and dichloroethylene in the soil. It determined that remedial objectives had been achieved and that the risks associated with soil contamination can be managed in-place. On 2/14/01, The Morey Corporation was granted a no further remediation determination by IEPA.	IEPA Response: On June 12, 1998, IEPA performed a site inspection of the Dynagear facility located at 2500 Curtiss St. following a complaint of dumping of gear cutting oil drippings into St. Joseph Creek by someone on Dynagear's property. IEPA did not observe any apparent violations of the Environmental Protection Act during the inspection.	IEPA Response: The Morey Corporation did not provide a written response to the IEPA questions; it only attached documentation. Respondent requested additional time to search its records for responsive information. The response is incomplete.	IEPA Response: 5/18/00 Phase I ESA was not attached to the response. Request a copy. No information regarding permits or violations was provided. Request information regarding waste disposal practices.

ENFORCEMENT CONFIDENTIAL PAGE 19 OF 29

The Morey Corporation Continued:

Response Summary: The facility consists of two parcels, comprising 3.9 acres of land. Onsite is a 43,200 square foot, one story, brick building. It was owned by M.C. Holdings, Inc., d/b/a the Morey Corporation until January 9, 2001, when Morey entered into a sales agreement for the facility at 2659 Wisconsin Avenue with Ross and Barbara Johnson for \$2 million. Morey is a manufacturer of small electronic components. During the assembly process, components were cleaned using a solvent, which was stored in 55-gallon drums in a small storage room along the eastern wall of the facility. A floor drain in the storage room discharged any spills to the ground outside the building's eastern wall.

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Precision Brand Products, Inc. 2250 Curtiss Street Downers Grove, IL 60515 (630) 969-7200 Respondents: Michael J. Hughes Neal, Gerber & Eisenberg Two North La Salle Street Chicago, IL 60602-3801 (312) 269-8064 Larry A. Franczyk, Vice President and General Manager 2250 Curtiss Street Downers Grove, IL 60515 (630) 969-7200	No IEPA letter. U.S. EPA sent: 1/30/02 Date received by PRP: 2/4/02 Extension to: 3/15/02 Response date: 3/25/02	U.S. EPA Response: DuPage Mfg. Co., which was purchased by Precision Brand Products in 1980, used TCE from approximately 1970 through 1978, and PCE from approximately 1978 through 1979. Both products were used in a liquid state for vapor degreasing purposes. Product was stored in drums and later in a 500-gallon AST. In the 1970s, non-contact cooling water from the degreasing operation was at times discharged to the floor drains or sumps associated with the sanitary sewer system. Product was treated in a recycling still that was installed in approximately 1976. Spent solvents and sludges were transported off-site for disposal or recycling. Precision Brand Products, Inc., uses non-hazardous pretroleum-based products in its processes.	U.S. EPA Response: Permits: None noted. Spills: In the mid-late 1990s, a supplier's truck ruptured a diesel fuel tank in the east parking lot. The cleanup was performed by the Downers Grove Fire Department. Facility Investigations: None noted.	U.S. EPA Response: Precision Steel Warehouse, Inc., is aware of anecdotal evidence that on-site solvent disposal may have occurred at the former Liberty Copper & Wire facility on Wisconsin St. This information was relayed to a former DuPage Manufacturing Co., a predecessor-in- interest to Precision Brand, employee in the 1970s by a maintenance employee of Liberty Copper & Wire.	U.S. EPA Response: None.	Minimal documentation regarding waste to or from the facility was provided Request documentation of Precision Brand Product, Inc.'s purchase of assets and assumption of liabilities of DuPage Mfg. Co., former subsidiary of Precision Steel Warehouse, Inc., including any facility investigations performed pursuant to the sale.

ENFORCEMENT CONFIDENTIAL PAGE 20 OF 29

Precision Brands Continued:

Response Summary: Precision Brand Products, Inc., currently owns and occupies the property at 2250 Curtiss St. Precision Steel Warehouse, Inc., purchased the property from Rudolph Ellsworth in 1965, and conveyed the property to its subsidiary, Precision Brand Products, Inc., in 1978. The building on the property was constructed during 1966-1967. Precision Brand Products, Inc., currently cuts metal coils and distributes hose clamps, and performed thread-rolling operations involving water based coolants between 1971 and 1998. Precision Brand Products, Inc., has never conducted manufacturing operations using chlorinated solvents. In 1980, Precision Brand Products, Inc., purchased certain assets and assumed certain liabilities of DuPage Mfg. Co, a subsidiary of Precision Steel Warehouse, which at that time occupied space in the same building with Precision Brand Products, Inc. DuPage Mfg. Co. conducted stamping and assembly of hose clamps. In the mid-1990s, Precision Steel Warehouse entered into a de minimis settlement with U.S. EPA regarding the DuPage Mfg. Co. transactions that occurred in the 1970s with American Chemical Services site in Griffith. IN.

ENFORCEMENT CONFIDENTIAL PAGE 21 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Rexnord Corporation 2400 and 2324 Curtiss Street Downers Grove, IL 60515 Respondent: Todd R. Wiener McDermott, Will & Emery 227 West Monroe Street Chicago, IL 60606-5096 phone: 312-984-7719	IEPA letter sent: 10/3/01 IEPA response date: 10/30/01 U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/4/01 Response date: 2/21/02	IEPA Response: PRP used 1,1,1-TCA in a small, enclosed vapor degreaser from 1989 to 1993, and TCE from 1993 to the present. Rexnord Corporation purchases approximately four drums of solvent per year and recovers two drums per year of waste solvent, with the remaining two drums represented by permitted air emissions. U.S. EPA Response: The 2324 Curtiss facility used approximately 20 gallons of methylene chloride, which contains 0-2% TCE and PCE, per month to clean filament winding machines between 1981 and the late 1980s. The facility now uses dimethyl ester. The facility at 2400 Curtiss purchased eight gallons of TCE per year from 1993 through 1997 and four 55-gallon drums per year from 1997 through at least 2001. Small quantities of 1,1,1-TCA were also purchased. IEPA Hazardous Waste Reports indicate that from 1982 through 2000, Rexnord Corporation generated an average of 100 gallons of waste TCE annually. Rexnord Corporation does not use PCE.	IEPA Response: Permits: None noted, Spills: There has never been a release of chlorinated solvents at the facility. In April 1985, a 3,000 gallon UST containing cutting oil was removed along with two feet of contaminated soil because of an irreparable leak. In October 1989, approximately 165-215 gallons of wastewater containing copper, chromium, and cadmium was accidentally discharged from the plating department. In January 1993, approximately 60 cubic yards of soil impacted with elevated concentrations of cadmium in the vicinity of a former aboveground Carbonate Process Tank were removed and disposed of off-site. Facility Investigations: IEPA inspected the facility in February 1986 for violations of 35 Ill. Adm. Code 725.211. No apparent violations were observed and the matter was resolved. In October 1989, Downers Grove Sanitary District (DGSD) sent a notice of violation of Permit requirements to Rexnord Corporation. Rexnord Corporation explained their standard operating procedures, which were satisfactory to DGSD. U.S. EPA Response: Permits: The facility at 2324 Curtiss St. is incorporated in the 2400 Curtiss St. facility's FESOP permit. Spills: None noted. Facility Investigations: Same as IEPA response.	IEPA Response: None noted.	IEPA Response: Rexnord Corporation did not provide information regarding prior ownership/operations at the facility. No environmental permits were attached to the response. U.S. EPA Response: Rexnord Corporation did not provide copies of environmental permits or diagrams of the facilities.	Rexnord Corporationdid not provide copies of environmental permits, documents relating to ownership of the property, or documentation of the physical description of the property and its facilities. Request these documents and/or perform a title search. Request information regarding Rexnord Corporation's corporate history, as no information was provided regarding predecessor companies.

ENFORCEMENT CONFIDENTIAL PAGE 22 OF 29

Rexnord Corp. continued:

Response Summary: IEPA Response: Rexnord Corporation and its predecessors (unmentioned) have owned an operated the facility at 2400 Curtiss Street since approximately 1957. There are no solid waste management units at the site.

<u>U.S. EPA Response</u>: Rexnord has owned and operated the facility at 2324 Curtiss Street since approximately 1981. Prior to 1981, the property at this address may have ben owned or operated by Commonwealth Edison. As of September 1995, a well on Rexnord's property became tied into the Village of Downers Grove's water system. Rexnord Corporation does not have facility invoices for purchases of chlorinated solvents from any time before 1990. One 3,000 gallon UST was removed in April 1985.

ENFORCEMENT CONFIDENTIAL PAGE 23 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Scot, Incorporated 2525 Curtiss St. Downers Grove, IL 60515 Respondent: Scot Incorporated Anthony Navitsky, Vice President and CFO Randy Slaboch, Director of Operations 2525 Curtiss Street Downers Grove, IL 60515 (630) 969-0620 Fax: (630) 969-4719	IEPA letter sent: 10/3/01 IEPA Response: 10/30/01 U.S. EPA CERCLA 104(e) sent: 03/29/02 U.S. EPA Response dated: 04/10/02	IEPA Response: Since 1958, chlorinated solvents have been used at the facility. TCE and other solvents are stored in a concrete room on the west side of the building, which was built in 1987. PCE was detected in all soil samples collected from the south side of the facility during the Phase II assessment. The highest concentrations was .0238 mg/kg. PCE (highest was 0.35 mg/kg) was detected in four and TCE (0.0412 mg/kg) in one of 11 soil borings taken during the Supplemental Phase II assessment. U.S. EPA Response: In response to the U.S. EPA's CERCLA 104(e) request, Scot Incorporated attached its IEPA response letter, but not the attachments to it.	IEPA Response: Permits: Scot, Incorporated has a industrial wastewater discharge permit to the sanitary sewer system, issued 4/21/97 that expires 4/21/02. It has an NPDES permit for stormwater and also holds several permits for handling explosives. Spills: No hazardous material spill or release was reported to the Illinois Emergency Management Agency for the facility. Facility Investigations: A Phase I ESA was performed in July 2000. The assessment determined there is little concern relating to current hazardous waste handling practices, but historical practices may be cause for concern. A Phase II Site Investigation was performed in August 2000, during which PCE was detected in all soil samples collected from the south side of the facility. A Supplemental Phase II Site Investigation was conducted in October 2001 to confirm results of the initial investigation. Low levels of PCE were detected in soil samples collected from the south side of the building. U.S. EPA Response: IEPA performed an on-site inspection of the facility on August 28, 2001. No results were attached to the response.	IEPA Response: Norwood Marking Systems, 2538 Wisconsin Ave., is a small quantity generator that was cited for RCRA violations, but was found to be compliant by 1992. Reliable Label, Inc., 2201 W. Curtiss St., was cited for RCRA violations, but was found to be compliant by 1993. Suburban Moving & Storage, 2400 Wisconsin Ave., is listed on the State of IL LUST report. U.S. EPA Response: None.	IEPA Response: None. U.S. EPA Response: In response to the U.S. EPA's CERCLA 104(e) request, Scot Incorporated attached its IEPA response letter. No responses were given to U.S. EPA's additional questions regarding onsite storage tanks, solvent management system, solvent suppliers and waste handlers, and floor drains. In addition, Scot Incorporated did not provide copies of correspondence between itself and the local government regarding discharges into St. Joseph Creek and the municipal sewer. Scot Incorporated suggests that U.S. EPA coordinate with IEPA to obtain the responses to its questions.	IEPA Response: A Phase I ESA was performed for the facility in 1994. Request a copy of this report. Request waste manifests and MSDSs for materials and products containing chlorinated solvents. U.S. EPA Response: In response to the U.S. EPA's CERCLA 104(e) request, Scot Incorporated attached its IEPA response letter. Scot Incorporated was non-responsive to most of U.S. EPA's requests. Request a copy of the IEPA 8/28/01 onsite inspection report. What were Scot Incorporated's storage and disposal practices for chlorinated solvents prior to 1987?

ENFORCEMENT CONFIDENTIAL PAGE 24 OF 29

Scot, Incorporated, Continued:

Response Summary: Scot Incorporated has owned the 3.8 acre facility since 1958, when the property was developed and the ~40,600 square foot building was constructed on site. Initial operations at the site included small engines manufacturing until about 1976 and globe manufacturing from 1960 until the late 1970s. Prior to its development, the property was used for agricultural purposes. Since 1976, Scot Incorporated has manufactured precision engineered pyrotechnic components and subsystems for use in aerospace applications. Hazardous materials are stored, processed, handled and disposed of in compliance with all laws. Flammable liquids are stored in a limited access room with spill containment attributes. There are no groundwater wells or waste management units on the facility. No releases or threatened releases of hazardous materials have occurred at the facility since 1958. In 1973, a UST for hazardous waste was installed. It was removed in 1988. Sewage disposal is connected to the city sewer system. Scot uses less than 25 gallons of paint/year in its processes.

ENFORCEMENT CONFIDENTIAL PAGE 25 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-reference	Questions Not Answered	Follow-Up Recommendations
Suburban Self Storage 2333 Wisconsin Avenue Downers Grove, IL 60515 Respondent: James M. Radlein, President Suburban Moving & Storage Co. 2100 Ogden Avenue Lisle, IL 60532 phone: 630-971-6601	No IEPA letter. U.S. EPA CERCLA 104(e) sent: 1/30/02 Date received by PRP: 2/2/02 Response date: 2/19/02	U.S. EPA Response: None. Suburban Self Storage's use of the facility at 2333 Wisconsin does not involve any hazardous substances.	U.S. EPA Response: Permits: None. Spills: Truck fuel storage tanks were identified as having leaked and were removed under the IEPA LUST program. Facility Investigations: In 1992, a Preliminary Assessment/Visual Site Inspection (PA/VSI) was performed at the 2333 Wisconsin Ave. facility. No areas of concern were identified. IEPA conducted Resource Conservation and Recovery Act (RCRA) inspections at the facility in January 1982 and November 1985, and identified apparent violations and deficiencies in paper work related to the waste analysis plan, personnel training records, the contingency plan, the operating record, the closure plan, and the closure cost estimate. Information regarding resolution was not available at the time of the PA/VSI, though the facility is no longer regulated under RCRA. A Phase I ESA for the 2333 Wisconsin Ave. property was conducted in November 1997, which recommended additional testing for xylene and PCE contamination. Only the cover letter to the report is included with the attachments.	U.S. EPA Response: Prior to 1986, Liberty Copper & Wire Co. generated waste enamel and solvent containing acetone, toluene, xylene, cresylic acid, and methanol (F003, F004, F005, D001) from coating and clean- up operations and from the disposal of off- specification coating mixtures. In 1985, Liberty Copper & Wire Co. generated approximately 9,000 pounds of waste enamel and solvent, which was shipped off- site. During RCRA closure activities in 1987, soil contamination was documented, with up to 57,100 ppm of xylene under the former outdoor drummed waste storage area. IEPA approved RCRA closure activities in 1987.	U.S. EPA Response: None.	Request a copy Phase I ESA report. Only the cover letter is included in the attachments. It is unknown whether the testing recommended by the Phase I ESA was ever completed. Request information regarding any additional testing. Pages 22-25 of the PA/VSI report, which include the conclusions and recommendations sections, are missing. Request a complete copy of the report.

ENFORCEMENT CONFIDENTIAL PAGE 26 OF 29

Suburban Self Storage Continued:

Response Summary: Suburban Self Storage is a household goods and office furnishings and equipment moving and storage company. It does not conduct any manufacturing operations nor use any hazardous substances. Suburban Self Storage owned or leased the facility at 2400 Wisconsin Ave. from 1971 through 1994, and has owned or leased the facility at 2333 Wisconsin Ave. from 1998 through the present. Burnside Construction operated the facility at 2400 from 1994 through the present, and Liberty Copper & Wire operated the facility at 2333 Wisconsin Ave. from 1961 through 1988. Suburban Self Storage's current facility consists of a 84,550-square-foot building and an outdoor paved parking area. A groundwater monitoring well was installed at the 2400 Wisconsin Ave. facility in October 1994. According to the PA/VSI report, there were four solid waste management units at the facility, one outdoor and two indoor drummed waste storage areas (all three of which were RCRA hazardous waste management units (HWMUs), and one neutralization tank. All have been inactive since 1986, though only two of the three HMWUs underwent RCRA closure. Prior to 1986, Liberty Copper & Wire used phenol and urethane in the mixing of enamel coatings and occasionally generated waste phenol and waste urethane.

ENFORCEMENT CONFIDENTIAL PAGE 27 OF 29

PRP Name Contact Information	Correspondence Information	Use/Generation of Chlorinated Solvents	Permits/Spills/Facility Investigations	PRP Cross-Reference	Questions Not Answered	Follow-Up Recommendations
Tricon Industries, Inc. 2325 Wisconsin Avenue Downers Grove, IL 60515 Respondent: Tricon Industries, Inc. Corporate Headquarters Ralph Grandle, President 1600 Eisenhower Lane, #200 Lisle, IL 60532 (630) 964-2330 Fax: (630) 829-5125	IEPA letter sent: 10/3/01 IEPA Response dated: 10/18/01	IEPA Response: A limited amount of hazardous chemicals are stored at the facility. PCE is used in the degreasing process. Waste PCE is shipped off-site for recycling. Between 1983 and 1990, Tricon Industries, Inc., generated waste TCE and PCE, according to the waste manifests provided with the response. Between 1992 and 1997, Tricon Industries, Inc., purchased an average of about 10 drums of PCE per year from Parko, Inc., or Finishing Equipment, Inc., for use in its degreaser.	IEPA Response: Permits: Since at least 1984, Tricon Industries, Inc., has held an IEPA Operating Permit to operate an open top vapor degreaser. The most recent was a lifetime permit issued 4/25/01. Solvent use is not to exceed 0.5 tons/month or 4.6 tons/year. PCE is the only solvent to be used in the degreasing process. Tricon Industries, Inc., is permitted by the Downers Grove Sanitary District to discharge industrial wastewater into the sanitary sewer system, subject to compliance with pretreatment standards. Spills: There have been no leaks, spills or releases of hazardous materials at the facility. There has been no soil removal from the facility. Facility Investigations: None noted.	IEPA Response: None noted.	IEPA Response: Tricon Industries, Inc., did not provide information on hazardous materials storage practices.	Request information on storage practices and amounts of hazardous chemicals kept onsite.

Response Summary: Tricon Industries, Inc., purchased the facility in 1959 and has been operating there since 1963. There were no prior operators at the property. Tricon Industries, Inc., manufactures insert injection molded componentry and performs metal stamping, assembly, plating and finishing operations. Plating/finishing is the only process that consumes hazardous materials, which are used in vapor degreasing, plating, and wastewater treatment. The facility does not have solid waste management units. All hazardous and non-hazardous wastes generated by the finishing department are collected in appropriate containers and removed by Heritage Crystal-Clean for disposal or recycling. Tricon Industries, Inc., performs quarterly wastewater sampling for pH, cyanide, copper, nickel, silver and zinc.

ENFORCEMENT CONFIDENTIAL PAGE 28 OF 29

APPENDIX A

ACRONYMS

AST - Aboveground Storage Tank

CERCLA -Comprehensive Environmental Response, Compensation and Liability Act

CERCLIS - Comprehensive Environmental Response, Compensation and Liability Information System

DGSD - Downers Grove Sanitary District

DSCM - Dry Standard Cubic Meter

ESA - Environmental Site Assessment

FESOP - Federally Enforceable State Operating Permit

LUST - Leaking Underground Storage Tank

IEPA - Illinois Environmental Protection Agency

NPDES - National Pollutant Discharge Elimination System

PCE - Perchloroethylene

PRP - Potentially Responsible Party

RCRA - Resource Conservation and Recovery Act

SARA - Superfund Amendment and Reauthorization Act

TCA - Trichloroethane

TCE - Trichloroethylene

US EPA - United States Environmental Protection Agency

UST - Underground Storage Tank